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January 8, 2025

VIA PACER & EMAIL

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Honorable Cathy L. Waldor, U.S.M.J.
Martin Luther King Jr.
Federal Building & Courthouse
50 Walnut Street, Room 4040
Newark, NJ 07102

Re: Duquene Pierre v. State of New Jersey, Department of Treasury, et al.
Civil Action No. 2:18-cv-03443-SDW-CLW

Dear Judge Waldor:

As Your Honor is aware, our office represents Plaintiff Duquene Pierre in the above-captioned matter, which is presently scheduled for a Settlement Conference on Thursday, January 23, 2025. By way of follow-up to our discussion at the most recent conference date of November 19, 2024, the parties have agreed to have the Honorable Douglas E. Arpert, U.S.M.J. (Ret.) act as the mediator in this case, as well as in the matter of Jean L. Dorval v. State of New Jersey, Department of Treasury, et al., Civil Action No. 2:20-cv-05997-SDW-CLW. In that regard, yesterday Judge Arpert emailed defense counsel Robert F. Varady, Esquire, and me in order to propose mediation dates of Monday, March 24th and Wednesday, March 26, 2025. On today's date Mr. Varady and I agreed to both of those dates, and this evening I emailed Judge Arpert to confirm our availability. Therefore, I anticipate that Judge Arpert shall furnish both counsel with mediation engagement letters within the next week.

Accordingly, since the parties have now agreed to mediate on the above dates, and since Mr. Varady informed me that unfortunately City Attorney William Holzapfel is ill and will not be available in January, Mr. Varady and I jointly request that the Settlement Conference scheduled for January 23rd be adjourned until any date after March 26, 2025, which is convenient for the court.

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We shall follow-up with Your Honor regarding this request, and we thank you very much for your consideration.

Respectfully yours,

/s/ Donald A. DiGioia

Donald A. DiGioia

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cc: Robert F. Varady, Esq (via email)
Michael S. Simitz, Esquire (via email)
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